

REMARKS

The present Amendment is in response to the Office Action having a mailing date of February 24, 2004. Claims 1-30 are pending in the present Application. Applicant has amended claim 20. Applicant has also added new claims 31-35. Consequently, claims 1-35 remain pending in the present Application.

Applicant has amended claim 20 to correct a minor error. Applicant has also added claims 31-35. New claims 31, 32, and 33 depend upon independent claims 1, 10, and 23, respectively. New claims 31-33 recite that default internet service provided (ISP) connection information is provided. Support for new claims 31-33 can be found in the specification, page 24, lines 2-4. New claims 34-35 recite online photo-sharing systems. Support for new claims 34-35 can be found in the specification, page 5, line 19-page 8, line 18. Accordingly, Applicant respectfully submits that no new matter is added.

In the above-identified Office Action, the Examiner objected to the specification because of boldfaced headings, the arrangement of the specification, the use of trademarks, and the abstract. The Examiner also objected to the specification because serial numbers for particular cross-referenced U.S. Patent Applications were missing. The Examiner also objected to the drawings because certain circles/buttons were unlabeled.

Applicant has amended the specification to remove the boldface on headings and rearranged the specification in accordance with 37 CFR 1.77(b). Further, Applicant has placed all trademarks in upper case letters and, where appropriate, added an indication of the generic terminology. Applicant has also amended the Abstract to remove the phrase "is disclosed". Further, Applicant has provided the serial numbers and, where appropriate, the issued patent numbers, for cross-

referenced applications. Accordingly, Applicant respectfully submits that the Examiner's objections to the specification have been addressed.

Applicant has also provided herewith a redlined copy of Fig. 5 indicating that the unlabeled circles/buttons are soft keys. Support for the labeling of the buttons can be found in the specification, page 20, line 18-page 22, line 18 (indicating buttons such as "Send", "Select", and "Continue" which may be implemented as soft keys). Accordingly, Applicant respectfully submits that the Examiner's objection to the drawings has been addressed.

In the above-identified Office Action, the Examiner objected claims 20-22 under 35 U.S.C. § 112, second paragraph. In particular, the Examiner noted that claim 20 was dependent upon claim 20. Claims 21-22 were rejected as being dependent upon claim 20.

Applicant has amended claim 20 to depend upon claim 19, rather than claim 20. Consequently, claim 20 is clear and definite. Claims 21-22 depend upon claim 20. Accordingly, Applicant respectfully submits that claims 21-22 are also clear and definite.

In the above-identified Office Action, the Examiner rejected claims 1-30 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,017,157 (Garfinkle) in view of U.S. Patent No. 6,581,094 (Gao). In particular, the Examiner relied upon Garfinkle for teaching an online photo-sharing service capable of hosting entity-specific photo-sharing websites for each entity. However, the Examiner acknowledged that Garfinkle "does not teach a method for hosting entity-specific photo-sharing websites for entity-specific image capture devices . . ." including the recited steps. Instead, the Examiner relied upon Gao for these features.

Applicant respectfully disagrees with the Examiner's rejection. Claim 1 recites a method for hosting entity-specific photo-sharing websites for entity-specific image capture devices. The method of claim 1 includes providing software for the entity-specific image capture devices that

causes the entity-specific image capture devices to transmit entity ID information when the image capture devices transmit images over the Internet. Claim 1 also recites providing an online photo-sharing service capable of hosting the entity-specific photo-sharing websites for each of the entities. Further, claim 1 recites that when the image capture devices connect to photo-sharing service, the photo-sharing service uses the entity ID received from the image capture devices to automatically associate the images to the photo-sharing website of the identified entity. Claim 10 recites an analogous online photo-sharing system in which the image capture devices are recited to be digital cameras.

Thus, the image capture device/digital cameras of claims 1 and 10 are recited to connect directly to the photo-sharing service and to provide entity specific information (information related to the image capture device/digital camera manufacturer and/or user) to the online photo-sharing service. Using the method and system recited in independent claims 1 and 10, therefore, a business-to-business, complete end-to end solution (manufacture of digital cameras to online photo-sharing) for their cameras. Specification, page 9, lines 17-22. In addition, a business-to-consumer solution is provided because users of the digital cameras can upload images captured on a digital camera without using a PC. Specification, page 9, line 23-page 10, line 2.

Applicant agrees that Garfinkle fails to teach or suggest the recited online photo-sharing service for hosting entity-specific photo-sharing websites for entity specific image capture devices. In particular, Garfinkle describes a conventional method for performing online photo sharing. Garfinkle uses photos from a conventional camera or digital camera. Garfinkle, col. 2, lines 50-52. However, in order to upload images from the digital camera, a personal computer (PC) is typically used. Garfinkle, col. 2, lines 53-64 and Fig. 9B (apparently indicating that the user first goes to a PC, which uploads the images directly to the server). Once the images are on

the server, selective authorization access to the images is provided using a unique access code for the images. Garfinkle, col. 4, lines 55-67. Using their PC, a photographer can perform specific tasks such as emailing the images, downloading the images to their PC, and ordering prints (hard copy) of the images. Garfinkle, col. 5, lines 19-29; col. 8, lines 8-37; and col. 9, lines 26-41. Thus, the system of Garfinkle is conventional in that uploading of images captured by a digital image capture device and subsequent manipulation of images is performed using a PC. Consequently, Garfinkle alone does not teach or suggest an image capture device/digital camera that connects directly to the photo-sharing service and provides entity specific information to the online photo-sharing service.

Gao fails to remedy the defects of Garfinkle. Gao describes a system which can be used in conjunction with certain digital devices that do not share a common connectivity scheme or a common operating system. Gao, col. 1, lines 28-50. The system of Gao includes clients, a server, and a digital appliance. The digital appliances are not clients or servers, but are apparently devices that can typically be coupled to a network such as printers, faxes, digital copiers, pagers, or PDAs. Gao, col. 3, line 62-col. 4, line 4. In order to support devices having different operating and connectivity schemes, Internet technology (more precisely a Unified Device Descriptor) is used. Gao, col. 4, lines 45-67. Thus, the system of Gao facilitates communication between devices that would *already ordinarily be connected in a network*. More specifically, Gao expressly states that the invention “facilitates cross-platform functionality. Thus, digital devices using different operating systems and connectivity can still communicate.” Gao, col. 4, lines 64-67. Consequently, although Gao describes a system for facilitating communication between devices that may already communicate, Gao fails to teach or suggest a mechanism for allowing devices that previously did not connect to the network to communicate via the network.

If the teachings of Gao are added to those of Garfinkle, then devices of Garfinkle that are already configured to be attached to a network but which have different connectivity and/or operating system may be used together. For example, the PC of Garfinkle may communicate with the server of Garfinkle despite differences in connectivity or operating systems. However, the teachings of Gao would not allow the digital camera of Garfinkle, which does not connect directly to the server of Garfinkle, to upload images or entity specific information to the server of Garfinkle. Instead, the PC of Garfinkle would still upload images (taken from the digital camera of Garfinkle) to the server. Thus, the combination would still fail to teach or suggest a mechanism for allowing an image capture device/digital camera to connect directly to the photo-sharing service and provide entity specific information to the online photo-sharing service. Consequently, Garfinkle in view of Gao fails to teach or suggest the method and system recited in independent claims 1 and 10. Accordingly, Applicant respectfully submits that independent claims 1 and 10 are allowable over the cited references.

Independent claim 23 recites a method for automatically sending images from entity-specific cameras to entity-specific websites. The method recited in claim 23 includes the steps of providing a plurality of cameras with means for allowing the cameras to communicate over a network and customizing the cameras for different entities by loading at least one entity ID into the camera. The method recited in claim 23 also includes providing an online photo-sharing service for hosting a plurality of photo-sharing websites and customizing each of the photo-sharing websites for a respective entity to create entity-specific websites. Each of the entity-specific websites is identified by a respective entity ID. Claim 23 further recites the steps of transmitting the entity ID from the camera to the photo-sharing website when uploading images to the photo-sharing service and receiving the images and associating the images with the entity-

specific website identified by the entity ID.

Thus, like claims 1 and 10, claim 23 recites a method that allows cameras to communicate over a network. In addition, the cameras also provide the entity information and images to the online photo-sharing website. Using the method and system recited in independent claim 23, therefore, a business-to-business, complete end-to end solution (manufacture of digital cameras to online photo-sharing) for their cameras. Specification, page 9, lines 17-22. In addition, a business-to-consumer solution is provided because users of the digital cameras can upload images captured on a digital camera without using a PC. Specification, page 9, line 23- page 10, line 2.

Claim 23 recites allowing cameras to communicate over a network and, more specifically, allowing the cameras to provide the entity information and images to the online photo-sharing website. Consequently, the arguments herein with respect to Garfinkle in view of Gao apply with full force to claim 23. Accordingly, Applicant respectfully submits that claim 23 is allowable over the cited references.

Claims 2-9, 11-22, and 24-30 depend upon independent claims 1, 10, and 23, respectively. Consequently, the arguments herein apply with full force to claims 2-9, 11-22, and 24-30. Accordingly, Applicant respectfully submits that claims 2-9, 11-22, and 24-30 are allowable over the cited references.

New claims 31, 32, and 33 depend upon claims 1, 10, and 23, respectively. Consequently, the arguments herein apply with full force to claims 31, 32, and 33. Accordingly, Applicant respectfully submits that claims 31, 32, and 33 are allowable over the cited references.

Furthermore, claims 31-33 are separately allowable over the cited references. Claims 31-33 recite providing the image capture device/digital camera with default ISP connection

information. Consequently, the image capture device/digital camera recited in claims 31-33 are capable of directly connecting to the online photo-sharing even if the end user does not have an ISP.

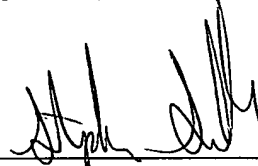
Applicant has found no mention in either Garfinkle or Gao of providing a mechanism for an image capture device/digital camera with default ISP connection information. Consequently, any combination of Garfinkle and Gao would also fail to teach or suggest this feature. Accordingly, Applicant respectfully submits that claims 31-33 are separately allowable over the cited references.

New claims 34-35 are analogous to claim 10. Consequently, the arguments herein apply with full force to claims 34-35. Accordingly, Applicant respectfully submits that claims 34-35 are allowable over the cited references.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

SAWYER LAW GROUP LLP



Stephen Sullivan
Attorney for Applicant(s)
Reg. No. 38,329
(650) 493-4540

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